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SEP 15 2011

**CD HORIZON® Spinal System
510(k) Summary
August 2011**

I. Company: Medtronic Sofamor Danek USA, Inc.
1800 Pyramid Place
Memphis, TN 38132
(901) 396-3133

Contact: Kevin Ford
Regulatory Affairs Manager

II. Proposed Proprietary Trade Name: CD HORIZON® Spinal System

III. Classification Names

Spinal Interlaminar Fixation Orthosis, Spinal Intervertebral Body Fixation Orthosis, and
Pedicle Screw Spinal System.

Class: III

Product Code(s): KWP, KWQ, MNI, MNH, NKB, NQP, OSH

Regulation No.: 888.3050, 888.3060, and 888.3070

IV. Description

The purpose of this Traditional 510(k) is to add Threaded Rods to the CD HORIZON®
Spinal System.

The CD HORIZON® Spinal System is intended to help provide immobilization and
stabilization of spinal segments as an adjunct to fusion of the thoracic, lumbar, and/or sacral
spine.

The CD HORIZON® Spinal System consists of a variety of shapes and sizes of rods, hooks,
screws, CROSSLINK® Plates, staples and connecting components, as well as implant
components from other Medtronic spinal systems, which can be rigidly locked into a variety
of configurations, with each construct being tailor-made for the individual case.

A subset of CD HORIZON® Spinal System components may be used for posterior pedicle
screw fixation in pediatric cases. These constructs may be comprised of a variety of shapes
and sizes of rods (ranging in diameters from 3.5mm to 6.35mm), hooks, screws,
CROSSLINK® Plates, and connecting components. Similarly to the CD HORIZON®

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implants used in adult cases, these components can be rigidly locked into a variety of configurations, with each construct being tailor-made for the individual case.

Certain components within the CD HORIZON® Spinal System are specifically excluded for use in pediatric patients. These include PEEK rods, CD HORIZON® SPIRE spinous process plate devices, Shape Memory Alloy Staples, DYNALOK® bolts, and TSRH® screws and washers. All screws used in pediatric cases are only cleared for use via a posterior approach. All of the components used in pediatric cases are fabricated from medical grade stainless steel, medical grade titanium, titanium alloy, and medical grade cobalt-chromium-molybdenum alloy.

Certain implant components from other Medtronic spinal systems can be used with the CD HORIZON® Spinal System in non-pediatric cases. These components include TSRH® rods, hooks, screws, plates, CROSSLINK® plates, connectors, staples, washers, GDLH® rods, hooks, connectors and CROSSLINK® bar and connectors; LIBERTY® rods and screws; DYNALOK® PLUS and DYNALOK CLASSIC® bolts along with rod/bolt connectors; and Medtronic Multi-Axial rods and screws. Please note that certain components are specifically designed to connect to 3.5mm, 4.5mm, 5.5mm diameter rods or 6.35mm diameter rods, while other components can connect to both 5.5mm rods and 6.35mm diameter rods. Care should be taken so that the correct components are used in the spinal construct.

CD HORIZON® hooks are intended for posterior use only. CD HORIZON® staples and CD HORIZON® ECLIPSE® rods and associated screws are intended for anterior use only. However, for patients of smaller stature and pediatric patients, CD HORIZON® 4.5mm rods and associated components may be used posteriorly. The CD HORIZON® Spinal System implant components are fabricated from medical grade stainless steel, medical grade titanium, titanium alloy, medical grade cobalt-chromium-molybdenum alloy, or medical grade PEEK OPTIMA-LT1. Certain CD HORIZON® Spinal System components may be coated with hy-droxyapatite. No warranties expressed or implied are made. Implied warranties of merchantability and fitness for a particular purpose or use are specifically excluded.

Never use stainless steel and titanium implant components in the same construct. Medical grade titanium, titanium alloy, and/or medical grade cobalt-chromium-molybdenum alloy may be used together. Never use titanium, titanium alloy, and/or medical grade cobalt-chromium-molybdenum alloy with stainless steel in the same construct. The CD

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CD HORIZON® Spinal System also includes anterior staples made of Shape Memory Alloy (Nitinol – NiTi). Shape Memory Alloy is compatible with titanium, titanium alloy, and cobalt-chromium-molybdenum alloy. Do not use with stainless steel. These staples are not to be used in pediatric patients. PEEK OPTIMA-LT1 implants may be used with stainless steel, titanium, or cobalt-chromium-molybdenum alloy implants. CD HORIZON® PEEK Rods are not to be used with CROSSLINK® Plates or in pediatric patients. To achieve best results, do not use any of the CD HORIZON® Spinal System implant components with components from any other system or manufacturer unless specifically allowed to do so in this or another Medtronic document. As with all orthopaedic and neurosurgical implants, none of the CD HORIZON® Spinal System components should ever be reused under any circumstances.

V. Indications for Use

The CD HORIZON® Spinal System with or without SEXTANT® instrumentation is intended for posterior, non-cervical fixation as an adjunct to fusion for the following indications: degenerative disc disease (defined as back pain of discogenic origin with degeneration of the disc confirmed by history and radio-graphic studies); spondylolisthesis; trauma (i.e., fracture or dislocation); spinal stenosis; curvatures (i.e., scoliosis, kyphosis and/or lordosis); tumor; pseudarthrosis; and/or failed previous fusion. Except for hooks, when used as an anterolateral thoracic/lumbar system, the CD HORIZON® Spinal System may also be used for the same indications as an adjunct to fusion. With the exception of degenerative disc disease, the CD HORIZON® LEGACY™ 3.5mm rods and the CD HORIZON® Spinal System PEEK rods and associated components may be used for the aforementioned indications in skeletally mature patients as an adjunct to fusion. The 3.5mm rods may be used for the specific pediatric indications noted below. When used for posterior non-cervical pedicle screw fixation in pediatric patients, the CD HORIZON® Spinal System implants are indicated as an adjunct to fusion to treat adolescent idiopathic scoliosis. The CD HORIZON® Pediatric Spinal System is intended to be used with autograft and/or allograft. Pediatric pedicle screw fixation is limited to a posterior approach.

The CDHORIZON SPIRE™ Plate is a posterior, single level, non-pedicle supplemental fixation device intended for use in the non-cervical spine (T1-S1) as an adjunct to fusion in skeletally mature patients. It is intended for plate fixation/attachment to spinous processes for the purpose of achieving supplemental fixation in the following conditions: degenerative disc disease (as previously defined); spondylolisthesis; trauma; and/or tumor. In order to achieve additional levels of fixation, the CD HORIZON® Spinal System rods may be connected to the VERTEX® Reconstruction System with the VERTEX® rod connector.

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Refer to the VERTEX® Reconstruction System Package Insert for a list of the VERTEX® indications of use.

VI. Identification of the Legally Marketed Predicate Devices Use to Claim Substantial Equivalence:

Documentation was provided which demonstrated the subject Threaded Rods are substantially equivalent to CD HORIZON® Spinal System components manufactured by Medtronic Sofamor Danek and cleared by the FDA in K031655 (S.E. 6/27/2003), K042453 (S.E. 10/7/2004), K042962 (S.E. 12/14/2004), K043488 (S.E. 3/21/2005), K091974 (S.E. 9/2/2009), K963655 (S.E. 11/27/1996), K981676 (S.E. 1/28/1999) and K993810 (S.E. 2/3/2000). Additionally, the geometry of the threaded rods are substantially equivalent to the predicate VERTEX® Spinal System threaded rods in K090714 (S.E. 4/17/2009) and K083071 (S.E. 11/14/2008).

VII. Summary of the Technological Characteristics:

The purpose of this Traditional 510(k) is to add a threaded geometry rods on the rod ends of various sizes and varying materials to the CD HORIZON® Spinal System family. The subject and predicate CD HORIZON® Spinal System rods are identical in terms of indications for use, intended use, performance specifications and technological characteristics. The key difference between the subject and predicate device is the addition of a threaded geometry on the rod ends.

Additionally, the geometry of the threaded rods are substantially equivalent to the predicate VERTEX® Spinal System threaded rods in K090714 (S.E. 4/17/2009) and K083071 (S.E. 11/14/2008).

VIII. Discussion of Non-Clinical Testing:

The test performed per ASTM F1717 (2010), "Standard Test Methods for Spinal Implant Constructs in a Vertebrectomy Model," approved July 1, 2010 was construct compression static bending, construct static torsion, and construct compression fatigue bending.

The subject device successfully met all acceptance criteria for these tests and hence Medtronic believes that documentation provided demonstrates that the CD HORIZON® Spinal System Threaded Rods do not introduce new issues of safety or effectiveness.

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IX. Discussion of Clinical Testing:

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No clinical testing was performed.

X. Conclusions Drawn from the Non-Clinical and Clinical Tests:

Based on the documentation provided, the subject device is deemed substantially equivalent to the listed predicate devices in terms of fundamental technology, intended use, indications for use, design and fundamental scientific technology.



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
10903 New Hampshire Avenue
Document Control Center – WO66-G609
Silver Spring, MD 20993-0002

June 27, 2013

Medtronic Sofamor Danek USA, Inc.
% Mr. Kevin Ford
Regulatory Affairs Manager
1800 Pyramid Place
Memphis, Tennessee 38132

Re: K111510

Trade/Device Name: CD HORIZON® Spinal System
Regulation Number: 21 CFR 888.3070
Regulation Name: Pedicle screw spinal system
Regulatory Class: Class III
Product Code: NKB, OSH, NQP, MNI, MNH, KWP, KWQ
Dated: August 25, 2011
Received: August 26, 2011

Dear Mr. Ford:

This letter corrects our substantially equivalent letter of September 15, 2011.

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA).

You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must

comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638 2041 or (301) 796-7100 or at its Internet address <http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm>. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to <http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm> for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address <http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm>.

Sincerely yours,

Erin FD Keith

For

Mark N. Melkerson
Director
Division of Orthopedic Devices
Office of Device Evaluation
Center for Devices and
Radiological Health

Enclosure

510(k) Number (if known): K111510

Device Name: CD HORIZON® Spinal System

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Prescription Use X OR Over-The-Counter Use
Per 21 CFR 801.109

(PLEASE DO NOT WRITE BELOW THIS LINE - CONTINUE ON ANOTHER PAGE IF NEEDED)

Concurrence of CDRH, Office of Device Evaluation (ODE)


(Division Sign-Off)
Division of Surgical, Orthopedic,
and Restorative Devices

510(k) Number K111510